

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:

LOCAL TV ADVERTISING ANTITRUST
LITIGATION

This Document Relates to All Actions

MDL No. 2867

No. 1:18-cv-06785

Honorable Virginia M. Kendall

**JOINT STIPULATED MOTION TO STAY ALL CLAIMS AND PENDING
DEADLINES FOR SETTling DEFENDANTS COX MEDIA GROUP, LLC,
CBS CORPORATION, AND FOX CORPORATION**

Plaintiffs Thoughtworx, Inc. d/b/a MCM Services Group (“Thoughtworx”), One Source Heating & Cooling, LLC (“One Source”), Hunt Adkins, Inc. (“Hunt Adkins”), and Fish Furniture (collectively, the “Plaintiffs”), and Defendants Cox Media Group, LLC (“Cox Media Group”), CBS Corporation (“CBS”), and Fox Corporation (“Fox”) (collectively, the “Settling Defendants”) submit this joint stipulated motion to stay all claims and pending deadlines for Settling Defendants, stating as follows:

1. On March 16, 2022, Plaintiffs filed a Consolidated Third Amended Antitrust Class Action Complaint (“Third Amended Complaint”), ECF No. 556, alleging claims against Settling Defendants Cox Media Group, CBS, and Fox, among others.
2. Prior to filing the Third Amended Complaint, Plaintiffs entered into agreements, or agreements in principle, to settle all claims with each of the Settling Defendants. The parties are preparing the necessary paperwork to request the Court’s approval of the settlements.
3. There is presently a March 30, 2022 deadline for the Settling Defendants to answer or otherwise respond to the Third Amended Complaint.
4. Counsel for Plaintiffs and the Settling Defendants conferred and agree it is

appropriate to stay all claims and all litigation deadlines for the Settling Defendants pending the Court's evaluation of the settlements.

5. Settling Defendants have authorized counsel for Plaintiffs to submit this joint stipulated motion to stay on Settling Defendants' behalf.

6. No party would be prejudiced by the entry of an order granting the requested relief, and the interests of justice favor the entry of such order.

WHEREFORE, Plaintiffs and Settling Defendants jointly and respectfully request that the Court enter an order granting this joint stipulated motion to stay all claims against and all litigation deadlines for Settling Defendants in this matter pending the Court's evaluation of the settlements.

Dated: March 22, 2022

Respectfully submitted:

/s/ Robert J. Wozniak

Robert J. Wozniak
FREED KANNER LONDON & MILLEN LLC
2201 Waukegan Road, Suite 130
Bannockburn, IL 60015
Tel: (224) 632-4500
rwozniak@fklmlaw.com

Liaison Counsel for Plaintiffs

/s/ Megan E. Jones

Megan E. Jones (admitted *pro hac vice*)
HAUSFELD LLP
600 Montgomery St., #3200
San Francisco, CA 94111
Tel: (415) 633-1908
mjones@hausfeld.com

Michael D. Hausfeld (admitted *pro hac vice*)
Hilary K. Scherrer (admitted *pro hac vice*)
HAUSFELD LLP
888 16th Street, N.W. #300
Washington, DC 20006
Tel: (202) 540-7200
mhausfeld@hausfeld.com
hscherrer@hausfeld.com

Gary I. Smith, Jr. (admitted *pro hac vice*)
HAUSFELD LLP
325 Chestnut Street, Suite 900
Philadelphia, PA 19106
Tel: (215) 985-3270
gsmith@hausfeld.com

Lead Counsel for Plaintiffs

/s/ Meegan Hollywood
Meegan Hollywood (admitted *pro hac vice*)
ROBINS KAPLAN LLP
900 Third Avenue, Suite 1900
New York, NY 10022
Tel: (212) 980-7400
mhollywood@robinskaplan.com

/s/ Kimberly A. Justice
Kimberly A. Justice
FREED KANNER LONDON & MILLEN LLC
923 Fayette Street
Conshohocken, PA 19428
Tel: (610) 234-6487
kjustice@fklmlaw.com

Plaintiffs' Steering Committee

/s/ Jennifer L. Giordano
Jennifer L. Giordano (admitted *pro hac vice*)
Allyson M. Maltas (admitted *pro hac vice*)
LATHAM & WATKINS LLP
555 Eleventh St., NW, Suite 1000
Washington, D.C. 20004
Tel: (202) 637.2200
Jennifer.Giordano@lw.com
Allyson.Maltas@lw.com

Elyse M. Greenwald (admitted *pro hac vice*)
LATHAM & WATKINS LLP
10250 Constellation Blvd. Suite 1100
Los Angeles, CA 90067
Tel: (424) 653.5695
Elyse.Greenwald@lw.com

Counsel for Defendant Cox Media Group, LLC

Nicholas J. Siciliano (Bar No. 6287387)
LATHAM & WATKINS LLP
330 North Wabash Ave., Suite 2800
Chicago, IL 60611
Tel: (312) 876.7700
Nicholas.Siciliano@lw.com

/s/ Yehudah L. Buchweitz

Yehudah L. Buchweitz (admitted *pro hac vice*)
WEIL, GOTSHAL & MANGES LLP
767 Fifth Avenue
New York, NY 10153
Tel: (212) 310-8526
yehudah.buchweitz@weil.com

Jeff L. White (admitted *pro hac vice*)
WEIL, GOTSHAL & MANGES LLP
2001 M St. N.W., Suite 600
Washington, DC 20036
Tel: (202) 682-7059
jeff.white@weil.com

Brian Alan Sher
Steven Gordon Trubac
BRYAN CAVE LEIGHTON PAISNER LLP
161 North Clark Street, Suite 4300
Chicago, IL 60601-3206
Tel: (312) 602-5000
brian.sher@bclplaw.com
steve.trubac@bclplaw.com

Counsel for Defendant CBS Corporation

/s/ Kenneth S. Reinker

George S. Cary (admitted *pro hac vice*)
Kenneth S. Reinker (admitted *pro hac vice*)
CLEARY GOTTlieb STEEN & HAMILTON LLP
2112 Pennsylvania Avenue, NW
Washington, DC 20037
Tel: (202) 974-1500
gcary@cgsh.com
kreinker@cgsh.com

Nathan P. Eimer
Vanessa G. Jacobsen
EIMER STAHL LLP
224 South Michigan Ave.
Chicago, IL 60604
Tel: (312) 660-7600
neimer@eimerstahl.com
vjacobsen@eimerstahl.com

Counsel for Defendant Fox Corporation